



IN DEFENSE OF ANIMALS

May 31, 2001

Donna Wieting, Chief
Marine Mammal Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910-3226

Dear Ms. Wieting:

I am writing on behalf of In Defense of Animals' eighty thousand members to voice our opposition to the U.S. Navy's proposal to further test and deploy the Low-Frequency Active (LFA) Sonar.

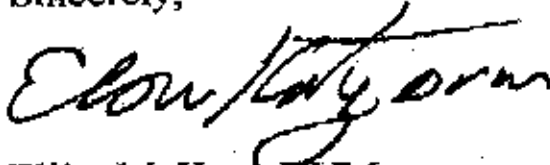
The proposed rule would grant the Navy a "small take permit" for the LFA system, and the Navy assumes the effects of LFA sonar will be negligible. They believe that increasing the sound levels from 150dB to 250dB will not cause additional stress or damage to cetaceans. This assertion contradicts decades of scientifically accepted evidence that indicates noise in the 110-115dB levels causes behavior changes in whales and dolphins.

By observing a small number of whales' initial reactions to sound many times less intense than LFA sonar and performing no long-term behavior assessment, the Navy's Environmental Impact Statement (EIS) has failed to adequately examine the impact of LFA sonar on the overall marine environment. The EIS neglects the potential effects of LFA sonar on socialization, feeding, travel, or other important behaviors, and instead emphasizes only tissue damage. Additionally, the EIS does not address the impact of LFA sonar on plankton, fish, and other ocean dwellers – creatures that provide the basis for cetaceans' diets. Indeed, previous studies have indicated that high intensity noise causes negative effects on plankton.

The Navy has also proposed to abstain from deploying the LFA system when cetaceans are within a one-kilometer radius of the transmitter. However, since the animals are submerged much of the time and are difficult to see in inclement weather, this "solution" does not protect the animals. Moreover, the Navy's own data indicate that 140dB sound levels will exist throughout an area of 300,000 square miles of ocean. Obviously, the Navy cannot possibly monitor this expanse of water to ensure that no cetaceans are harmed by the noise.

The NMFS' ability to issue a "small take permit" is undermined by the Navy's insufficient EIS that directly contradicts many scientific studies documenting the harmful effects of sound waves on cetaceans. If the LFA system is deployed, it may very well cause the demise of huge amounts of marine life. I urge you to uphold the Marine Mammal Protection Act and deny the Navy permission to further test or deploy the LFA system.

Sincerely,

A handwritten signature in cursive script, appearing to read "Elliot M. Katz".

Elliot M. Katz, DVM
President
In Defense of Animals